

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

	)	
In re: Alice Thomas	)	
	)	Case Number: 18-12376
	)	
	)	Chapter 13
Debtor(s).	)	
	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE AMENDED PLAN**

COME(S) NOW, the Debtor(s), Alice Thomas, through the undersigned counsel.  
Edward Gonzalez, Esq., and moves this honorable court for an extension of time to file  
her amended plan in the above cited case, and for cause states as follows:

1. Debtor consented to denial of confirmation with leave to amend of the last plan she proposed.
2. Among the issues pending are the size of priority tax debt owed to the Internal Revenue Service.
3. At this time, the last filed Proof of Claim lists the tax years 2016 and 2017 as “Estimated – SEE NOTE”. However, there is no “Note” in the document. (See attached IRS POC.)
4. Furthermore, the Debtor prepared the tax returns and sent them to IRS for posting.
5. Counsel spoke to the IRS agent at the Insolvency unit to resolve this issue three weeks ago. The agent told counsel she would look into the issue and get back to him.
6. As of today, she has not called back. Counsel called again today and left a message asking for a call back to resolve this issue.

WHEREFORE, Debtor respectfully asks for additional time to resolve this issue with IRS to be able to finalize a plan providing for the proper amount of priority taxes.

Dated: November 15, 2018

Respectfully Submitted,  
/s/ Edward Gonzalez  
Edward Gonzalez,  
VA Bar #39882  
2405 Eye Street, NW, Suite 1A  
Washington, DC 20037  
(202) 822-4970

**Certificate of Service**

I hereby certify that the foregoing was sent by the court's electronic mailing and/or by first class, postage pre-paid, mail to the following:

1. U.S. Trustee
2. Chapter 13 Trustee

/s/ Edward Gonzalez  
Edward Gonzalez